Case 5:07-cr-00788-JF Document 89 Filed 03/14/2008 Page 1 of 2 Mark D. Eibert (Bar # 116570) Attorney at Law P. O. Box 1126 Half Moon Bay, CA 94019-1126 Telephone: (650) 638-2380 Fax: (650) 712-8377 Attorney for: Defendant Daniel Rangel UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA CR NO. 07-00788 JF (NJV) UNITED STATES OF AMERICA, Plaintiff, STIPULATION AND [PROPOSED] ORDER TO AMEND CONDITIONS OF RELEASE vs. TO ALLOW DEFENDANT TO TRAVEL DANIEL RANGEL, FOR WORK Defendant. Defendant Daniel Rangel, through his attorney, and the United States, through its Officer within the United States. The reasons are as follows. Mr. Rangel is employed as a truck driver for a moving and storage company. His work

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attorney, hereby stipulate and move this Court to amend Mr. Rangel's conditions of release to allow him to travel as needed for his employment and with the approval of his Pretrial Services

frequently requires him to travel to different states. At the bail hearing, the parties agreed, and the Magistrate Judge ordered, that he be permitted to travel for employment within the states of California, Oregon, Washington, Nevada and Utah. Subsequently, however, Mr. Rangel received an assignment from his employer that would take him to the East Coast, and to and through numerous states that are not on the list already approved by the Court. It is in the interests of all concerned that Mr. Rangel be able to maintain employment and earn a living while on bail. STIPULATION AND PROPOSED ORDER TO AMEND CONDITIONS OF RELEASE, U.S. V. DANIEL RANGEL, CR NO.

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Accordingly, the parties have stipulated that his conditions of release may be modified to allow travel within the United States for purposes of employment and with the approval of his Pretrial Services Officer. The Order should also require Mr. Rangel to provide his Pretrial Services Officer with his itinerary before any such travel.

The parties therefore respectfully request an Order amending his conditions of release to allow him to travel as specified above.

Dated: March 13, 2008

Respectfully submitted,

/s/ Mark D. Eibert

MARK D. EIBERT Attorney for Defendant Daniel Rangel

/s/ Jeff Nedrow

JEFF NEDROW Attorney for the United States

<u>ORDER</u>

Good cause appearing therefore, it is hereby ORDERED that defendant Daniel Rangel may travel within the United States for employment purposes, subject to the prior approval of his Pretrial Services Officer. Mr. Rangel shall also provide his Pretrial Services Officer with his itinerary prior to any such travel.

Dated: March 4, 2008

UNITED STATES MAGISTRATE JUDGE
NANDOR J. VADAS

STIPULATION AND PROPOSED ORDER TO AMEND CONDITIONS OF RELEASE, U.S. V. DANIEL RANGEL, CR NO.